

To whom it may concern,

I would like to make the following **public comment** regarding minimizing public exposure to creosote and coal tar toxic components through the air during the cleanup of the Quendall Terminal Superfund Site.

There is no data from the air monitoring of the volatile toxic components of creosote and coal tar in the air near the site. It is assumed that if there are no complains of the odors from neighboring properties there no increase in levels of the toxic components of the creosote and coal tar in the air. The reliance on “odor” complains to assess the level of the toxic components is concerning and it is not enough in this case.

The volatile organic components of creosote and coal tar include highly toxic and carcinogenic chemicals (among them are: benzene, toluene, naphthalene, benzopyrene and hundreds of others). A small increase in levels of those chemicals in the air can pose a risk even before the odor threshold is reached. The CDC website mentions that “most individuals can begin to smell benzene (one of the creosote components) in air at 1.5 to 4.7 ppm. The odor threshold generally provides adequate warning for acutely hazardous exposure concentrations but is inadequate for more chronic exposures”. OSHA permissible exposure level for benzene exposure (TWA 8-hour) is 1 ppm. Effects of chronic and repeated exposure to benzene include leukemia, developmental and reproductive problems.

Currently, the contaminants are in thick liquid form concentrated deep in the soil and in the lake sediment. During the cleanup activities, when contaminants will be brought to the surface, the volatile components are expected to get into the air and the “odors” will be produced. It is a real public concern as there is no safe level of exposure to carcinogens, developmental and reproductive toxins.

Therefore, it is important to emphasize the following points for the upcoming Remedial Design stage of the project:

1. The release of toxic components into the air during cleanup activities should be unacceptable in this densely developed area. It is super important that there will be **no shortcuts in utilizing all available protective technologies** (dust suppression, vapor controls and others) to keep contaminants from leaving the site through the air.
2. **The air monitoring at the site needs to be performed to monitor the effectiveness of those protective technologies. Public need to know** if the toxic chemicals from creosote and coal tar are detected in the air, at what level and what is the affected radius, even if there are no complaints of “odors” received. There should be no reliance on just “odors” complains.

In conclusion, the area is densely populated and there are private residences just on the border with the site. Imagine a child living next to the site who will grow up being long term exposed to all those toxins through the air it breathes. Therefore, it is a priority to protect the public from exposure to highly toxic creosote and coal tar chemicals through the air during the multiyear cleanup.

Sincerely,

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